

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

LIBERTY MUTUAL INSURANCE)	
COMPANY AND SUBSIDIARIES,)	
)	Civil No. 1:05-11048-RCL
Plaintiff,)	
)	
v.)	
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	

LIBERTY MUTUAL FIRE INSURANCE)	
COMPANY AND SUBSIDIARIES,)	
)	Civil No. 1:05-11049-RCL
Plaintiff,)	
)	
v.)	
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	

PLAINTIFFS' REQUEST FOR LEAVE TO FILE A REPLY
TO UNITED STATES' IMPROPER MOTION TO FILE A REPLY BRIEF

In opposition to plaintiffs' Motion to Strike Defendant's brief, et al., defendant has moved the Court for permission to file another brief in the pending cross-motions for summary judgment. The motion is improper for several reasons, including counsel's failure to correctly style its request as a motion and her failure to consult under Rule 7.1. If the improper motion is accepted by the Court, plaintiffs respectfully request the opportunity to file a short reply to oppose the motion and to correct misleading and incorrect assertions made by defendant.

Respectfully submitted,

Date: November 16, 2006

/s/ Peter H. Winslow

Peter H. Winslow
Admitted Pro Hac Vice
1875 Eye Street, NW, Ste. 1050
Washington, D.C. 20006
Tel: (202) 434-9162
Fax: (202) 331-2032
Attorney for Plaintiffs